



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WK:GSM  
F. #2021R00137

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 18, 2021

By Email and ECF

Kannan Sundaram  
Federal Defenders  
One Pierrepont Plaza, 16th Floor  
Brooklyn, NY 11201

Re: United States v. Ryan Behar  
Criminal Docket No. 21-187 (RPK)

Dear Mr. Sundaram:

Enclosed please find the government's second production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government again requests reciprocal discovery from the defendant.

The Government's Discovery

I. Documents and Tangible Objects

- Instagram subscriber information for "rocko\_conti (45299271090)," bates-numbered BEHAR008599-BEHAR008627; and
- Instagram subscriber information for "slimvectra1980 (6354314690)," bates-numbered BEHAR008628-BEHAR008632.

II. Other Crimes, Wrongs or Acts

- A redacted New York City Police Department (“NYPD”) complaint and follow-up forms pertaining to 2017 allegations of misconduct with a child, bates-numbered BEHAR008633-BEHAR008651.

Very truly yours,

MARK J. LESKO  
Acting United States Attorney  
Eastern District of New York

By: /s/ Garen S. Marshall  
Garen S. Marshall  
Assistant U.S. Attorney  
(718) 254-6569

Enclosures

cc: Clerk of the Court (RPK) (by ECF) (without enclosures)